

The Honorable Judge David G. Estudillo

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Gabriella Sullivan, *et al.*,

Plaintiffs,

v.

Bob Ferguson, in his official capacity as
Washington State Attorney General, *et al.*
Defendants.

No. 3:22-cv-05403-DGE

**DECLARATION OF BRANDON COMBS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT**

I, Brandon Combs, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this Declaration in support of plaintiffs' motion for summary judgment.

2. I am the President of Firearms Policy Coalition, Inc. ("FPC") and have held that position since FPC was founded in 2014. As President, I am duly authorized to act on behalf of the organization. FPC is a nonprofit membership organization incorporated in Delaware with a primary place of business in Clark County, Nevada.

3. In my role as President, I am familiar with FPC's purposes as an organization and FPC's membership. I oversee and often participate directly in FPC's review of and commentary on issues affecting members, communication informing members of issues affecting them, and process for evaluating involvement in litigation.

1 4. FPC seeks to create a world of maximal human liberty and freedom to promote and
2 protect individual liberty, private property, and economic freedoms. In furtherance of this mission,
3 FPC seeks to protect, defend, and advance the People's rights, especially but not limited to the
4 inalienable, fundamental, and individual right to keep and bear arms.

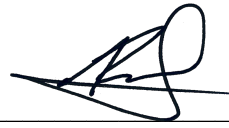
5 5. FPC has thousands of members and supporters nationwide, including thousands of
6 members in Washington.

7 6. Gabriella Sullivan, John Hwang, and Rainier Arms are members of FPC.

8 8. FPC brings this lawsuit on behalf of its thousands of members in Washington,
9 including Sullivan and Hwang.

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11 DATED this 4th day of August, 2023

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Brandon Combs, President
Firearms Policy Coalition, Inc.